

DOCKET FILE COPY ORIGINAL

HOLLAND & KNIGHT LLP

2099 Pennsylvania Avenue, N.W.
Suite 100
Washington, D.C. 20006-6801

202-955-3000
202-955-5564 Fax
www.hklaw.com

ORIGINAL

RECEIVED

MAR 16 2004

March 16, 2004

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DAVID A. O'CONNOR
202-828-1889

Internet Address:
doconnor@hklaw.com

VIA HAND DELIVERY

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Petition for Rulemaking, MM Docket No. 00-127
KJRR-DT, Jamestown, ND (Facility ID No. 55364)

Dear Ms. Dortch:

Enclosed, on behalf of Red River Broadcast Co., LLC ("Red River"), is an Engineering Statement in support of its Petition for Rulemaking in this matter. As set forth in the Statement, and after consultations with Commission staff, Red River now proposes DTV Channel 18 in lieu of DTV Channels 14 or 30 in Jamestown, North Dakota.

Please date-stamp the enclosed extra copy of this filing. Should any questions arise concerning this matter, please communicate with the undersigned.

Respectfully submitted,



David A. O'Connor
Counsel for Red River Broadcast Co., LLC

Enclosure

cc (w/encl.): Nazifa Naim, FCC

No. of Copies rec'd 074
List ABCDE

OFFICIAL

RECEIVED

MAR 16 2004

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ENGINEERING STATEMENT
ON BEHALF OF
RED RIVER BROADCAST COMPANY, LLC
KJRR-DT, JAMESTOWN, NORTH DAKOTA
REQUEST FOR CHANGE OF DTV CHANNEL
MM DOCKET NO. 00-127, RM-9894 AND DA 00-1569

MARCH 2004

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

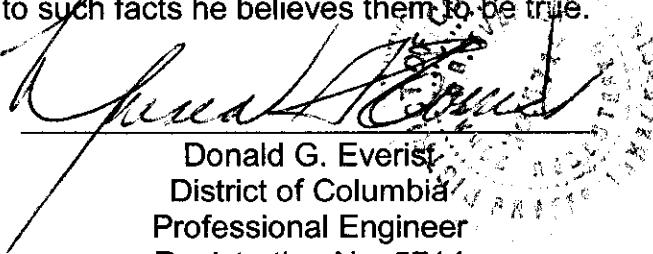
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.


Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 11th day of April, 2004.


Craig L. Taylor
Notary Public

My Commission Expires: 2/28/2008

COHEN, DIPPELL AND EVERIST, P. C.

KJRR-DT, JAMESTOWN, NORTH DAKOTA

PAGE 1

This engineering statement has been prepared on behalf of Red River Broadcast Company, LLC, licensee of television station KJRR(TV), Jamestown, North Dakota, and is in response to an informal FCC inquiry. The FCC requested additional information with reference to protection to Canadian allotments contained in the *Letter of Understanding*¹ ("LOU") for the rule making request to change to DT Channel 30 (MM Docket No. 00-127, RM-9894 and DA 00-1569). This request was to replace DT Channel 14 assigned in MM Docket 87-268. An allocation analysis has been performed and KJRR(TV) requests to change to DTV Channel 18 from the requested Channel 30 in the request contained in MM Docket No. 00-127, RM-9894 and DA 00-1569.

Table I sets forth the domestic stations studied by Longley-Rice OET Bulletin 69 in which protection is required.

KJRR-DT proposes the following:

Channel:	18
ERP:	1000 kW directional (See Exhibit E-1 for antenna pattern)
Center of Radiation	
Above Ground:	137 meters
Center of Radiation:	592 meters AMSL
HAAT:	135 meters
Coordinates:	N 46° 55' 27" ² W 98° 46' 19"

¹"Letter of Understanding Between the Federal Communications Commission of the United States of America and Industry Canada Related to the Use of the 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-806 MHz Bands for the Digital Television Broadcasting Service Along the Common Border".

²This is an existing site and the coordinates listed are a result of MM Docket 95-5.

COHEN, DIPPELL AND EVERIST, P. C.

KJRR-DT, JAMESTOWN, NORTH DAKOTA

PAGE 2

NAD-27

An allocation analysis of the domestic situation using the Federal Communications Commission OET Bulletin 69 dated July 2, 1997 and the FCC supplemental processing guidelines dated August 1998 and relevant Canadian notifications and guidance in the *Letter of Understanding* modified to include terrain³ and population data for Canada has been performed. The analysis was performed by using the FCC Longley-Rice model adapted for use for an INTEL computer. The results of this adapted program domestically has been compared to other known FCC studies and have been found to give comparable results.

Table II provides the results of this analysis which demonstrates compliance with the provisions of the *Letter of Understanding* released September 29, 2000, with reference to the Canadian allotments, MB-DT-113, SA-DT-143, MB-TV-469, and MB-TV-449.

Based on an analysis contained herein, Channel 18 is acceptable under the two percent/ten percent threshold standard for modification of initial DTV allotment under Section 73.623(c)(2) of the FCC Rules.

A study of translators and LPTV stations pending, authorized, or licensed within 50 km find no co-channel or adjacent channel listings.

³Based on Global 30-second datum and population data for Canada.

COHEN, DIPPELL AND EVERIST, P. C.

TABLE I
INTERFERENCE SUMMARY
KJRR, JAMESTOWN, NORTH DAKOTA
CHANNEL 18 1000 KW DIRECTIONAL 135 METERS HAAT
MARCH 2004

Interference Analysis

A study of predicted interference by the proposed DT service has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (July 2, 1997) and the Public Notice, "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Windows98/Intel platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculations identical to the FCC's program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The effect of any variance in calculated population values versus the FCC's program is minimized when differencing a given model's results, e.g., new interference equals total interference less baseline interference. The effect is further reduced for ratios of calculated population values, e.g., incremental population affected as a percent of total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 km² using 3-second terrain data sampled approximately every 0.1 km at one degree azimuth intervals with 1990 census centroids.

The following conditions were investigated:

Proposed Modification: DT, UHF Channel 18, a height of 135 meters HAAT (592 meters RCAMSL) and an ERP of 1000 kW directional at: N 46° 55' 27", W 98° 46' 19" (NAD-27)

<u>Affected Station</u>	<u>Distance</u> km	<u>Percent Interference Caused by Proposed DT</u> <u>New</u>
KBMY (Lic), Ch.17, Bismarck, ND BLCT-19850412KH	159.3	0.0
KDSD-TV (CP), Ch.17, Aberdeen, SD BPEDT-20000217AAG	179.7	0.0
KDSD-DT (PLN), Ch.17, Aberdeen, SD	179.6	0.0
--		

COHEN, DIPPELL AND EVERIST, P. C.

TABLE I
INTERFERENCE SUMMARY
KJRR, JAMESTOWN, NORTH DAKOTA
CHANNEL 18 1000 KW DIRECTIONAL 135 METERS HAAT
MARCH 2004
(continued)

<u>Affected Station</u>	<u>Distance</u> km	<u>Percent Interference Caused by Proposed DT</u> <u>New</u>
KQCD-TV (CP), Ch.18, Dickinson, ND BPCDT-19991015ABD	320.1	0.0
KQCD-DT (PLN), Ch.18, Dickinson, ND --	319.9	0.0
KESD-TV (CP), Ch.18, Brookings, SD BPEDT-20000217AAC	311.6	1.2
KESD-DT (PLN), Ch.18, Brookings, SD --	311.8	1.2
KJRE (Lic), Ch.19, Ellendale, ND BLET-19920515KE	70.0	0.8
KJRE (App), Ch.19, Ellendale, ND BPET-19960229KE	70.0	0.0
KVRR (CP), Ch.19, Fargo, ND BPCDT-19991028ACA	195.6	0.0
KVRR-DT (PLN), Ch.19, Fargo, ND --	195.6	0.0

COHEN, DIPPELL AND EVERIST, P. C.

TABLE II
INTERNATIONAL
INTERFERENCE SUMMARY
KJRR, JAMESTOWN, NORTH DAKOTA
CHANNEL 18 1000 KW DIRECTIONAL 135 METERS HAAT
MARCH 2004

<u>Affected Station</u>	<u>Distance</u> km	<u>Percent Interference Caused by Proposed DT</u> <u>New</u>
MB-TV-449, Ch.18, Lac du Bonnet, MB	424.5	0.0
MB-TV-469, Ch.18, Pembina Valley, MB	245.7	0.0
SA-DT-143, Ch.18, Moosomin, SK	413.7	0.0
MB-DT-113, Ch.18, Brandon, MB	334.7	0.0

TABULATED DATA FOR AZIMUTH PATTERN

TYPE: ATL-S

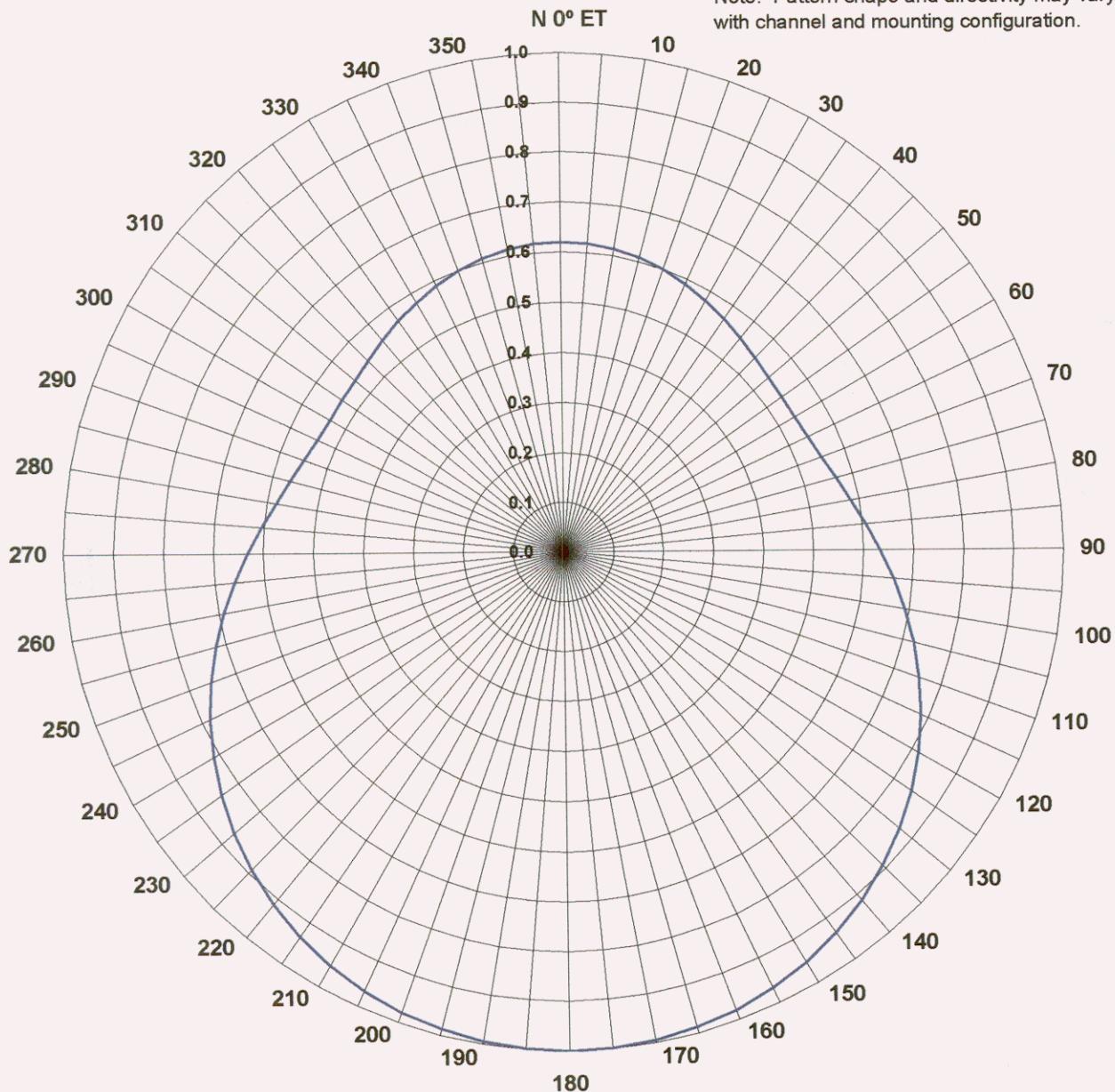
ANGLE	FIELD	dB									
0	0.619	-4.17	92	0.643	-3.84	184	0.999	-0.01	276	0.601	-4.42
2	0.619	-4.17	94	0.655	-3.68	186	0.998	-0.02	278	0.592	-4.55
4	0.618	-4.18	96	0.667	-3.52	188	0.997	-0.03	280	0.583	-4.69
6	0.617	-4.19	98	0.679	-3.36	190	0.995	-0.04	282	0.575	-4.81
8	0.615	-4.22	100	0.691	-3.21	192	0.992	-0.07	284	0.568	-4.91
10	0.614	-4.24	102	0.703	-3.06	194	0.990	-0.09	286	0.561	-5.02
12	0.611	-4.28	104	0.715	-2.91	196	0.986	-0.12	288	0.555	-5.11
14	0.609	-4.31	106	0.728	-2.76	198	0.983	-0.15	290	0.550	-5.19
16	0.606	-4.35	108	0.740	-2.62	200	0.979	-0.18	292	0.546	-5.26
18	0.602	-4.41	110	0.753	-2.46	202	0.974	-0.23	294	0.542	-5.32
20	0.599	-4.45	112	0.765	-2.33	204	0.969	-0.27	296	0.539	-5.37
22	0.595	-4.51	114	0.778	-2.18	206	0.964	-0.32	298	0.537	-5.40
24	0.591	-4.57	116	0.790	-2.05	208	0.958	-0.37	300	0.536	-5.42
26	0.587	-4.63	118	0.802	-1.92	210	0.952	-0.43	302	0.535	-5.43
28	0.582	-4.70	120	0.813	-1.80	212	0.945	-0.49	304	0.535	-5.43
30	0.578	-4.76	122	0.825	-1.67	214	0.938	-0.56	306	0.536	-5.42
32	0.573	-4.84	124	0.836	-1.56	216	0.931	-0.62	308	0.538	-5.38
34	0.569	-4.90	126	0.847	-1.44	218	0.923	-0.70	310	0.539	-5.37
36	0.564	-4.97	128	0.858	-1.33	220	0.915	-0.77	312	0.542	-5.32
38	0.560	-5.04	130	0.868	-1.23	222	0.906	-0.86	314	0.545	-5.27
40	0.556	-5.10	132	0.878	-1.13	224	0.897	-0.94	316	0.548	-5.22
42	0.552	-5.16	134	0.888	-1.03	226	0.888	-1.03	318	0.552	-5.16
44	0.548	-5.22	136	0.897	-0.94	228	0.878	-1.13	320	0.556	-5.10
46	0.545	-5.27	138	0.906	-0.86	230	0.868	-1.23	322	0.560	-5.04
48	0.542	-5.32	140	0.915	-0.77	232	0.858	-1.33	324	0.564	-4.97
50	0.539	-5.37	142	0.923	-0.70	234	0.847	-1.44	326	0.569	-4.90
52	0.538	-5.38	144	0.931	-0.62	236	0.836	-1.56	328	0.573	-4.84
54	0.536	-5.42	146	0.938	-0.56	238	0.825	-1.67	330	0.578	-4.76
56	0.535	-5.43	148	0.945	-0.49	240	0.813	-1.80	332	0.582	-4.70
58	0.535	-5.43	150	0.952	-0.43	242	0.802	-1.92	334	0.587	-4.63
60	0.536	-5.42	152	0.958	-0.37	244	0.790	-2.05	336	0.591	-4.57
62	0.537	-5.40	154	0.964	-0.32	246	0.778	-2.18	338	0.595	-4.51
64	0.539	-5.37	156	0.969	-0.27	248	0.765	-2.33	340	0.599	-4.45
66	0.542	-5.32	158	0.974	-0.23	250	0.753	-2.46	342	0.602	-4.41
68	0.546	-5.26	160	0.979	-0.18	252	0.740	-2.62	344	0.606	-4.35
70	0.550	-5.19	162	0.983	-0.15	254	0.728	-2.76	346	0.609	-4.31
72	0.555	-5.11	164	0.986	-0.12	256	0.715	-2.91	348	0.611	-4.28
74	0.561	-5.02	166	0.990	-0.09	258	0.703	-3.06	350	0.614	-4.24
76	0.568	-4.91	168	0.992	-0.07	260	0.691	-3.21	352	0.615	-4.22
78	0.575	-4.81	170	0.995	-0.04	262	0.679	-3.36	354	0.617	-4.19
80	0.583	-4.69	172	0.997	-0.03	264	0.667	-3.52	356	0.618	-4.18
82	0.592	-4.55	174	0.998	-0.02	266	0.655	-3.68	358	0.619	-4.17
84	0.601	-4.42	176	0.999	-0.01	268	0.643	-3.84	360	0.619	-4.17
86	0.611	-4.28	178	1.000	0.00	270	0.632	-3.99			
88	0.621	-4.14	180	1.000	0.00	272	0.621	-4.14			
90	0.632	-3.99	182	1.000	0.00	274	0.611	-4.28			

AZIMUTH PATTERN

TYPE: ATL-S
Directivity: Numeric 1.83 dB (2.62)
Peak(s) at:

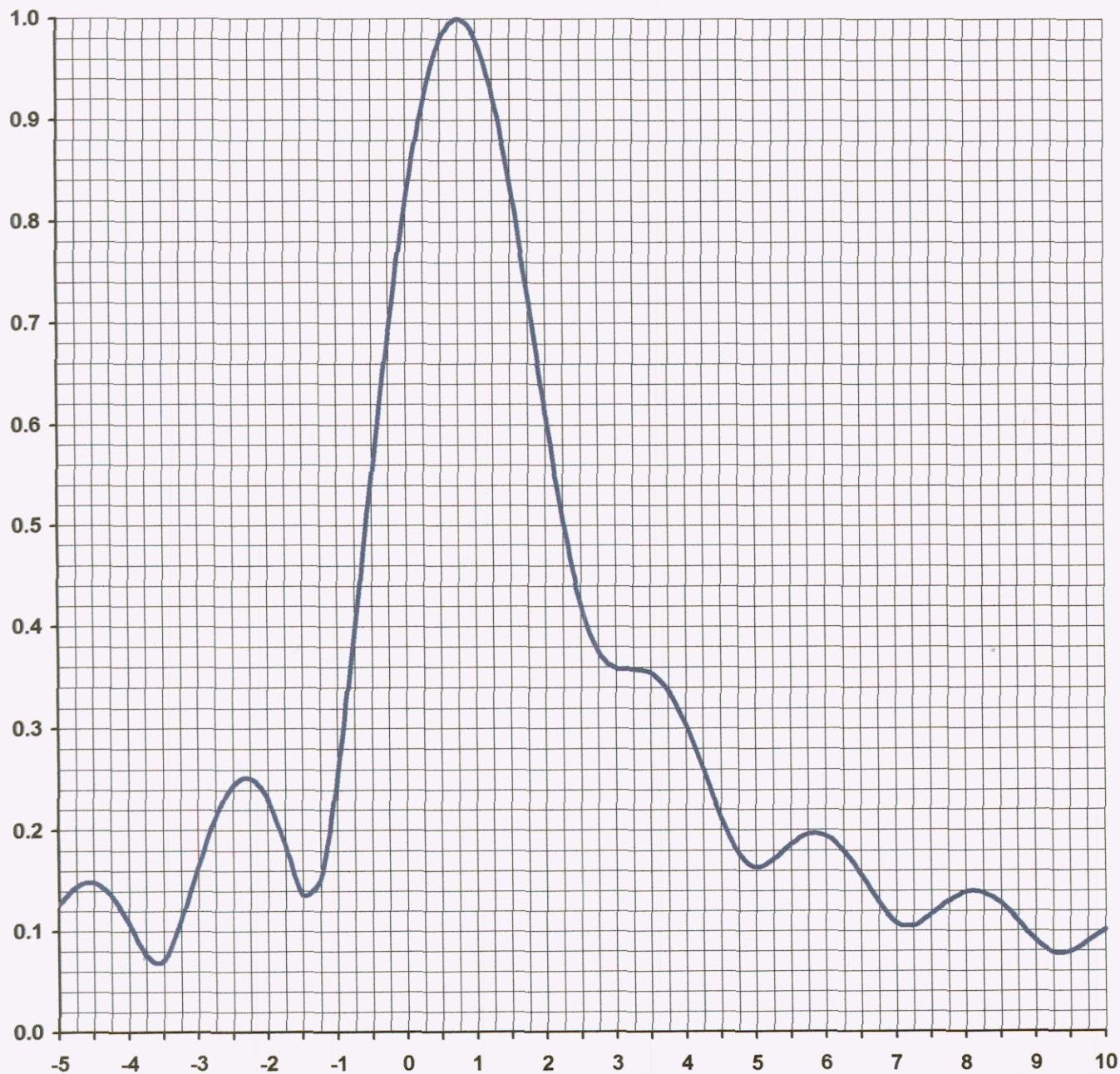
Polarization: Horizontal
Channel:
Location:

Note: Pattern shape and directivity may vary
with channel and mounting configuration.



ELEVATION PATTERN

TYPE:	ATL25H3H	
Directivity:	Numeric	dBd
Main Lobe:	25.00	(13.98)
Horizontal:	16.97	(12.30)
Beam Tilt:	0.75 Degrees	
Polarization:	Horizontal	
Channel:		
Location:		



TABULATED DATA FOR ELEVATION PATTERN
TYPE: ATL25H3H
-5 to 10 degrees in 0.25 increments
10 to 90 degrees in 0.50 increments

ANGLE	FIELD	dB												
-5.00	0.127	-17.92	6.75	0.128	-17.86	27.00	0.035	-29.12	50.50	0.021	-33.56	74.00	0.021	-33.56
-4.75	0.145	-16.80	7.00	0.108	-19.33	27.50	0.023	-32.77	51.00	0.031	-30.17	74.50	0.028	-31.06
-4.50	0.148	-16.59	7.25	0.105	-19.58	28.00	0.028	-31.06	51.50	0.036	-28.87	75.00	0.033	-29.63
-4.25	0.135	-17.39	7.50	0.116	-18.71	28.50	0.038	-28.40	52.00	0.035	-29.12	75.50	0.037	-28.64
-4.00	0.108	-19.33	7.75	0.130	-17.75	29.00	0.040	-27.96	52.50	0.028	-31.06	76.00	0.040	-27.96
-3.75	0.076	-22.38	8.00	0.139	-17.14	29.50	0.031	-30.17	53.00	0.018	-34.89	76.50	0.042	-27.54
-3.50	0.071	-22.97	8.25	0.138	-17.23	30.00	0.021	-33.56	53.50	0.012	-38.42	77.00	0.042	-27.54
-3.25	0.112	-19.05	8.50	0.127	-17.92	30.50	0.027	-31.37	54.00	0.020	-33.98	77.50	0.041	-27.74
-3.00	0.165	-15.65	8.75	0.109	-19.25	31.00	0.037	-28.64	54.50	0.029	-30.75	78.00	0.040	-27.96
-2.75	0.213	-13.43	9.00	0.090	-20.92	31.50	0.038	-28.40	55.00	0.035	-29.12	78.50	0.037	-28.64
-2.50	0.244	-12.25	9.25	0.078	-22.16	32.00	0.030	-30.46	55.50	0.036	-28.87	79.00	0.034	-29.37
-2.25	0.251	-12.02	9.50	0.079	-22.05	32.50	0.020	-33.98	56.00	0.032	-29.90	79.50	0.030	-30.46
-2.00	0.230	-12.77	9.75	0.090	-20.96	33.00	0.024	-32.40	56.50	0.023	-32.77	80.00	0.027	-31.37
-1.75	0.185	-14.68	10.00	0.101	-19.91	33.50	0.034	-29.37	57.00	0.013	-37.72	80.50	0.023	-32.77
-1.50	0.136	-17.33	10.50	0.106	-19.49	34.00	0.037	-28.64	57.50	0.012	-38.42	81.00	0.018	-34.89
-1.25	0.154	-16.28	11.00	0.083	-21.62	34.50	0.030	-30.46	58.00	0.021	-33.56	81.50	0.015	-36.48
-1.00	0.257	-11.80	11.50	0.060	-24.44	35.00	0.020	-33.98	58.50	0.030	-30.46	82.00	0.011	-39.17
-0.75	0.399	-7.98	12.00	0.073	-22.73	35.50	0.021	-33.56	59.00	0.036	-28.87	82.50	0.008	-41.94
-0.50	0.550	-5.19	12.50	0.088	-21.11	36.00	0.031	-30.17	59.50	0.037	-28.64	83.00	0.005	-46.02
-0.25	0.695	-3.17	13.00	0.078	-22.16	36.50	0.036	-28.87	60.00	0.033	-29.63	83.50	0.003	-50.46
0.00	0.821	-1.71	13.50	0.055	-25.19	37.00	0.032	-29.90	60.50	0.026	-31.70	84.00	0.002	-53.98
0.25	0.918	-0.74	14.00	0.052	-25.68	37.50	0.022	-33.15	61.00	0.016	-35.92	84.50	0.003	-50.46
0.50	0.980	-0.18	14.50	0.069	-23.22	38.00	0.017	-35.39	61.50	0.008	-41.94	85.00	0.004	-47.96
0.75	1.000	0.00	15.00	0.072	-22.85	38.50	0.026	-31.70	62.00	0.014	-37.08	85.50	0.005	-46.02
1.00	0.981	-0.17	15.50	0.056	-25.04	39.00	0.034	-29.37	62.50	0.024	-32.40	86.00	0.005	-46.02
1.25	0.923	-0.70	16.00	0.041	-27.74	39.50	0.034	-29.37	63.00	0.032	-29.90	86.50	0.006	-44.44
1.50	0.835	-1.57	16.50	0.052	-25.68	40.00	0.027	-31.37	63.50	0.037	-28.64	87.00	0.005	-46.02
1.75	0.726	-2.78	17.00	0.062	-24.15	40.50	0.017	-35.39	64.00	0.038	-28.40	87.50	0.005	-46.02
2.00	0.610	-4.29	17.50	0.056	-25.04	41.00	0.019	-34.42	64.50	0.036	-28.87	88.00	0.004	-47.96
2.25	0.504	-5.96	18.00	0.038	-28.40	41.50	0.029	-30.75	65.00	0.030	-30.46	88.50	0.003	-50.46
2.50	0.420	-7.54	18.50	0.037	-28.64	42.00	0.035	-29.12	65.50	0.022	-33.15	89.00	0.002	-53.98
2.75	0.375	-8.53	19.00	0.052	-25.68	42.50	0.033	-29.63	66.00	0.012	-38.42	89.50	0.001	-60.00
3.00	0.359	-8.90	19.50	0.055	-25.19	43.00	0.024	-32.40	66.50	0.005	-46.02	90.00	0.000	-99.99
3.25	0.358	-8.92	20.00	0.043	-27.33	43.50	0.015	-36.48	67.00	0.012	-38.42			
3.50	0.354	-9.02	20.50	0.030	-30.46	44.00	0.019	-34.42	67.50	0.022	-33.15			
3.75	0.336	-9.47	21.00	0.038	-28.40	44.50	0.029	-30.75	68.00	0.030	-30.46			
4.00	0.303	-10.37	21.50	0.049	-26.20	45.00	0.035	-29.12	68.50	0.036	-28.87			
4.25	0.259	-11.75	22.00	0.047	-26.56	45.50	0.033	-29.63	69.00	0.039	-28.18			
4.50	0.212	-13.47	22.50	0.033	-29.63	46.00	0.025	-32.04	69.50	0.040	-27.96			
4.75	0.177	-15.07	23.00	0.027	-31.37	46.50	0.015	-36.48	70.00	0.039	-28.18			
5.00	0.163	-15.76	23.50	0.039	-28.18	47.00	0.018	-34.89	70.50	0.035	-29.12			
5.25	0.171	-15.34	24.00	0.046	-26.74	47.50	0.027	-31.37	71.00	0.029	-30.75			
5.50	0.186	-14.61	24.50	0.039	-28.18	48.00	0.034	-29.37	71.50	0.022	-33.15			
5.75	0.196	-14.15	25.00	0.027	-31.37	48.50	0.035	-29.12	72.00	0.013	-37.72			
6.00	0.194	-14.24	25.50	0.028	-31.06	49.00	0.029	-30.75	72.50	0.004	-47.96			
6.25	0.179	-14.94	26.00	0.039	-28.18	49.50	0.019	-34.42	73.00	0.005	-46.02			
6.50	0.155	-16.19	26.50	0.043	-27.33	50.00	0.014	-37.08	73.50	0.013	-37.72			

Federal Communications Commission
Commission Registration System (CORES)
CORES Certification Form

I, David O'Connor certify that the FCC Registration Number (FRN) listed below is true and correct to the best of my knowledge, information and belief.

FCC Registration Number (FRN) **0002162221-65**

ENTITY NAME

R E D R I V E R B R O A D C A S T C O . , L L C

#11291483 v1